

Connors v. DHMC et al
Case No. 2:10-cv-94

Exhibit 2



Jennifer Meagher <j.meagher.wattslawfirmpc@gmail.com>

CONNORS/DHMC - SCHEDULE

2 messages

Norman Watts Esq <nwatts@wattslawfirmpc.us>**Thu, Nov 4, 2010 at 1:46 PM**

To: Edward Kaplan <ekaplan@sulloway.com>

Cc: Jennifer Meagher <j.meagher.wattslawfirmpc@gmail.com>

Ed - My proposal:

12/3 - Kelleher, D.West, Platt

1/13 - Sateia, Coursins

1/14 - Parker, Pomerantz

1/19 - Lambert, Watts

1/26 - R. Green

1/28 - Holding

If you wish to concludes Dr. Connors' depo on any of these dates, we can slide the witnesses back.

NW

WATTS LAW FIRM PC**Norman E. Watts, Esq.****19 Central Street/PO Box 270****Woodstock VT 05091-0270****Tel: (802) 457-1020 Fax: (802) 432-1074****www.WattsLawFirmPC.com**

Jennifer Meagher <j.meagher.wattslawfirmpc@gmail.com>**Fri, Nov 19, 2010 at 11:31 AM**

To: Jeanne Batchelder <jbatchelder@sulloway.com>

Jeanne:

Here are the dates proposed.

Thanks.

----- Forwarded message -----

From: **Norman Watts Esq** <nwatts@wattslawfirmpc.us>
Date: Thu, Nov 4, 2010 at 1:46 PM
Subject: CONNORS/DHMC - SCHEDULE
To: Edward Kaplan <ekaplan@suloway.com>
Cc: Jennifer Meagher <j.meagher.wattslawfirmpc@gmail.com>

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Jennifer Meagher
Law Clerk

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REPLY TO: CAPITAL OFFICE
Fax number: (603) 224-2557
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December 22, 2010

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(1904-1980)

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AND OTHER STATES

Norman E. Watts, Esquire
Watts Law Firm
P. O. Box 270
Woodstock, VT 05091-0270

Re: Connors v. DHMC, et al.

Dear Norman:

As I understand it, you have requested fourteen (14) depositions, and have suggested some dates in January and February. I understand that you would prefer to complete these depositions prior to the Court's ruling on the Motion for Judgment on the Pleading (although I still believe it would be wise to wait to see what the Court determines before spending weeks taking depositions). If you still would prefer to arrange the depositions, I suggest that we schedule the depositions according to each deponent's work location. I will arrange conference rooms for the Dartmouth Hitchcock physicians and Dartmouth Medical School employees: Donald West, M.D., Worth Parker, M.D., Alan Green, M.D., Ronald Green, M.D., William Torrey, M.D., Robert Racusin, M.D., Walter F. Wallace, M.D. Michael Landon and Jim Platt.

We can work with people from the VA and New Hampshire Hospital to request a conference room at those facilities for the depositions of David Coursins, M.D., Andrew Pomerantz, M.D., Lisa Lambert, M.D., and Bradley V. Watts, M.D.

You have also requested the deposition of Michael J. Sateia, M.D. It's my understanding that you are requesting him as a treating physician of Dr. Connors. We will be happy to arrange the deposition, but I would appreciate if you would confirm whether you are deposing him as a treating physician, or as an employee of Dartmouth Hitchcock Medical Center.

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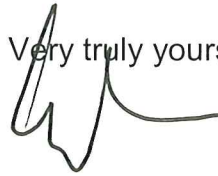
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December 22, 2010
Page 2

I would like to depose your experts, James C. Beck, M.D., Ph.D. and Robert L. Bancroft, Ph.D. Seems like we have a lot of work ahead of us.

Please give me a call and we can discuss these scheduling issues.

Very truly yours,

A handwritten signature in black ink, appearing to read 'E. Kaplan', with a stylized, sweeping flourish extending to the right.

Edward M. Kaplan

/jbb